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13  
14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 ALLSTATE INSURANCE COMPANY,  
17 ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY, ALLSTATE  
18 INDEMNITY COMPANY, and ALLSTATE  
FIRE & CASUALTY INSURANCE  
19 COMPANY,

20 Plaintiffs,

21 v.

22 RUSSELL J. SHAH, MD, DIPTI R. SHAH,  
MD, RUSSELL J. SHAH, MD, LTD., DIPTI  
23 R. SHAH, MD, LTD., and RADAR  
MEDICAL GROUP, LLP dba UNIVERSITY  
24 URGENT CARE, DOES 1-100, and ROES  
101-200,

25 Defendants.

26  
27 AND RELATED CLAIMS  
28

CASE NO. 2:15-cv-01786-APG-CWH

**STIPULATION TO INCLUDE AARON  
LAW GROUP INTO THE STIPULATED  
CONFIDENTIALITY AND PROTECTIVE  
ORDER (ECF NO. 39) FOR THE  
DISCLOSURE OF DOCUMENTS  
PURSUANT TO F.R.C.P. 45 SUBPOENA**

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE  
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,  
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and  
4 the law firm of AARON LAW GROUP (non-party herein after referred to as "ALG") hereby  
5 stipulate and agree as follows:

6 1. Plaintiffs served ALG with a subpoena pursuant to F.R.C.P. 45 for the production of  
7 documents regarding communications and payments made by and between Law Firm and the  
8 Defendants during ALG's representation of certain clients in personal injury claims for which  
9 Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

10 2. ALG is aware that Plaintiffs have subpoenaed several law firms seeking the same type  
11 of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*  
12 *Belsky, et. al. Case No. 2:15-cv-00065-MMD-CWH ("Belsky")*.

13 3. ALG understands that this Court presides over both the instant matter as well as the  
14 *Belsky* matter, and that this Court has ruled consistently in both these cases and ordered other law  
15 firms to produce the same type of documents request of ALG.

16 4. A stipulated confidentiality and protective order in this case entered between Plaintiffs  
17 and Defendants for the disclosure of confidential, sensitive or other protected information was  
18 approved by this Court on May 20, 2016. (ECF No. 39).

19 5. ALG was not a party to the stipulated confidentiality and protective order. (ECF No.  
20 39).

21 6. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also  
22 ordered that the confidentiality and protective order (ECF No. 39) be applied to those law firms.

23 7. In accordance with this Court's prior rulings both in this action and in the *Belsky*  
24 matter, the parties hereby stipulate and agree that the protections and scope articulated in the  
25 Stipulated Confidentiality and Protective Order approved by this Court on May 20, 2016. (ECF No.  
26 39) be extended in their entirety to cover ALG in its compliance with Plaintiffs' subpoena.

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1 8. ALG will produce all documents responsive to the subpoena within ten (10) days of  
2 approval and entry of this Order by the Court.

3 IT IS SO STIPULATED.

4 Dated:

Dated:

5 MCCORMICK, BARSTOW, SHEPPARD,  
6 WAYTE & CARRUTH LLP

AARON LAW GROUP

7 By: 

By: 

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11  
12  
13 ORDER

14 IT IS SO ORDERED.

15 DATED this 14 day of January, 2019.

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17   
18 UNITED STATES MAGISTRATE JUDGE  
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